

Exhibit 7

United State District Court
for the
Southern District of New York

In re: Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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This document applies to:

All Cases

**PLAINTIFFS' 30(B)(6) NOTICE OF ORAL DEPOSITION OF
SANA-BELL, INC. AND SANABEL AL KHEER, INC.**

To: Defendants, Sana-Bell, Inc. and Sanabel Al Kheer, Inc.
Through their attorney of record,
Christopher C.S. Manning, Esquire
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Washington, DC 20001
(cmanning@the-manning-group.com)

Please take notice that, under Federal Rule of Civil Procedure 30(b)(6), Plaintiffs in the above-captioned litigation will take the oral deposition of Defendants, Sana-Bell, Inc. ("Sana-Bell") and Sanabel Al Kheer, Inc. ("Sanabel") (collectively, "Defendants" or the "Sanabel Defendants") on September 9, 2015, beginning at 9:30 a.m. at the offices of Cozen O'Connor, 1200 19th St. NW, Washington, DC 20036, United States of America, or at a place and time to be agreed by the parties. The deposition will be taken stenographically before an officer duly

authorized to administer oaths. Please also take notice that the deposition may also be videotaped and real time transcription services may be utilized. The deposition shall be taken in compliance with this Court's prior orders, the Federal Rules of Civil Procedure, and the Local Rules of this Court. The deposition will continue from day to day until the examination is completed. You are invited to attend and cross-examine.

Under Rule 30(b)(6), the Sanabel Defendants shall designate one or more agents, officers, or other knowledgeable persons who can testify on behalf of Defendants with respect to the subjects identified below for the time period from 1992 through the present:

- (1) The identification of, search for, collection of, preservation of, and disposition of documents in the care, custody, control of the Sanabel Defendants responsive to Plaintiffs' Requests For Production of Documents served on September 13, 2007;
- (2) The identification of, search for, collection of, preservation of, and disposition of documents in the care, custody, control of the Sanabel Defendants responsive to Plaintiffs' Requests For Production of Documents served on December 10, 2010;
- (3) The identification of, search for, collection of, preservation of, and disposition of documents in the care, custody, control of the Sanabel Defendants responsive to Plaintiffs' Supplemental Requests For Production of Documents served on July 31, 2012;
- (4) The identification of, search for, collection of, preservation of, and disposition of documents in the care, custody, control of the Sanabel Defendants regarding corporate transactions of the Sanabel Defendants, including but not limited to the following examples:

- a. Minutes of corporate meetings, and
 - b. Documents regarding real estate transactions by a Sanabel Defendant, including specifically all documents regarding any real estate transaction concerning property located at 360 S. Washington Street, Falls Church, VA;
- (5) The steps undertaken by the Sanabel Defendants to identify, search for, collect, secure, preserve and/or dispose of potentially relevant and discoverable records following the initial filing of claims against the Sanabel Defendants in 2002;
- (6) The steps undertaken by the Sanabel Defendants to identify, search for, collect, secure, preserve and/or dispose of potentially relevant and discoverable records following the date on which the Sanabel Defendants first received actual or constructive notice of the potential filing of claims against them for any terrorist attack, including the attacks on September 11, 2001;
- (7) Documents of the Sanabel Defendants that are or were at one time in the possession of the Federal Bureau of Investigations (FBI) or other United States authorities, including steps undertaken by the Sanabel Defendants to identify, collect, secure, preserve and/or dispose of such documents;
- (8) The steps undertaken by the Sanabel Defendants to identify, search for, collect, secure, preserve, and/or dispose of relevant records in the physical possession of attorneys, accountants, banks, advisors, or other agents or alter egos of the Sanabel Defendants;
- (9) The steps undertaken (including but not limited to, step in connection with the purported dissolution of Sana-Bell and transfer of certain of its rights and assets to

Sanabel) to ensure that corporate records of Sana-Bell were identified, searched for, collected, secured, and preserved, including any steps regarding any other disposition of documents of Sana-Bell (e.g., steps to discard or destroy documents);

- (10) All information regarding the sale of the building at 360 S. Washington Street, including the disposition of the proceeds of that sale.

The Sanabel Defendants have the duty under Rule 30(b)(6) of the Federal Rules of Civil Procedure to designate one or more representative(s) to testify on their behalf regarding the matters identified, and to set forth, for each person designated, the matters on which the person will testify. Please take further notice that, just as if served with a subpoena, the witness is required to produce for inspection and copying at the time and place noticed, all documents and tangible things related to the subject-matter of the deposition.

Dated: August 25, 2015

Signed:

/s Robert T. Haefele
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cc: Counsel of record